

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	§	Chapter 11 Case
	§	
Old LC, Inc., <i>et al.</i> ¹	§	Case No. 19-11791 (BLS)
	§	
Debtors.	§	Jointly Administered

Official Committee of Unsecured Creditors	§	
of Old LC, Inc., et al., for and on behalf of	§	
the estates of Old LC, Inc., <i>et al.</i> ;	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Adv. No. 20-51002 (BLS)
	§	
Upfront V, LP, Breakwater Credit	§	
Opportunities Fund, L.P.; Upfront GP V,	§	
LLC; Mark Suster; Dana Kibler; Gregory	§	
Bettinelli; Saif Mansour; Aamir Amdani;	§	
Eric Beckman; Darrick Geant; and Joseph	§	
Kaczorowski	§	
	§	
<i>Defendants.</i>	§	

PLAINTIFF'S NOTICE TO TAKE ORAL DEPOSITION
OF MICHAEL CARNEY

TO: Michael Carney
c/o Colin R. Robinson
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box. 8705
Wilmington, Delaware 19899-8705

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rule of Civil Procedure 45(a)(4), Plaintiff Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., *et al.* (the "Plaintiff") hereby notifies all parties to this action and their counsel of record of Plaintiff's intention to take the oral

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

deposition of Michael Carney. This deposition will take place by Zoom video conference on Thursday, July 29, 2021, at 9:30 a.m. eastern, and continue thereafter from hour to hour and day to day until completed. This deposition will be conducted pursuant to, and in accordance with, the Federal Rules of Civil Procedure before a certified court reporter. This deposition will be recorded stenographically and will be videotaped.

Dated: June 22, 2021
Wilmington, Delaware

Respectfully submitted,

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served pursuant to the Federal Rules of Bankruptcy Procedure on this 21st day of June, 2021.

/s/ Joel B. Bailey

Joel B. Bailey